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May 8, 2025

BY ECF

The Honorable Hector Gonzalez
United States District Court Judge
United States Courthouse
Eastern District of New York
Brooklyn New York, 11201

Re: Defense Counsel's Failure to Appear at May 8, 2025 phone conference
22-cv-05566-RPK Smith v. All Capital Motors Inc. et al

Dear Judge Cho:

The undersigned, Jeremy M. Iandolo, Esq., respectfully submits this letter motion to show cause as to why I failed to appear for the telephonic status conference scheduled by this Court on May 8, 2025.

The nonappearance was not willful or intended in any way to cause delay, disrespect the Court, or prejudice the Pro Se Plaintiff, Ms. Takhara Smith. Rather, it resulted from a law office calendaring error, whereby the scheduled conference was inadvertently not entered into the firm's internal docketing system. I take full responsibility for this oversight.

At no time has the undersigned attempted to avoid or ignore the authority of this Court. In fact, I have appeared for each and every previously scheduled conference, including those held before the Honorable Magistrate Judge Cheryl L. Pollak, and have diligently participated in all phases of this litigation. I have also taken proactive steps to ensure all parties, including the pro se Plaintiff, remain in compliance with the Court's rules and directives.

Moreover, the undersigned has remained in ongoing communication with Plaintiff in a good-faith effort to explore potential resolutions of the matter. These efforts reflect a continued commitment to advancing the case efficiently, respectfully, and in accordance with the Court's supervision.

Accordingly, I respectfully request that the Court excuse the inadvertent failure to appear at today's conference in light of my otherwise consistent participation and good-faith conduct in this matter. I remain fully available to appear before the Court at its convenience and to address any concerns arising from this incident.

Thank you for your time and consideration.

Respectfully submitted,

Sincerely,

Jeremy M. Pandolo, Esq